



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Jerry Campbell
Department of Pesticide Regulation
California Environmental Protection Agency
1220 N Street
Sacramento, California 95814

Dear Mr. Campbell:

Subject: Diazinon Reregistration Labeling
Changes Which Supersede the December 1988 Registration
Standard

This letter is in response to your phone inquiry and a request from Ciba-Geigy Corporation regarding clarification of the United States Environmental Protection Agency's labeling requirements for diazinon products under the Diazinon Registration Standard.

In 1987, the EPA issued a comprehensive Data Call-In for diazinon, which did not include a requirement to revise labeling. This Data Call-In was issued only to holders of technical product registrations. In response to the DCI, Ciba-Geigy elected to generate the data to support many of the registered crops while the two other registrants elected to share in the cost of data development. During its initial evaluation of the chemical and the data requirements, Ciba-Geigy elected to drop some uses and asked to generate residue chemistry data supporting standardized use patterns for various crop groups. The Agency agreed with this approach, but asked the company to revise its end-use product labels to reflect the supported crops and use patterns which were to be tested in the upcoming residue program. The company agreed and began to revise its labels.

In December, 1988 the EPA issued the Diazinon Registration, Standard. Unlike the DCI, the Standard did include label language requirements for technical and formulated products. However, since issuance of the Standard the Agency reviewed and

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accepted new acute toxicity data for formulated products which prompted labeling changes and alternate language addressing other areas was accepted. The Agency reviewed residue data for almonds, celery, cabbage, broccoli, grapes, pome fruits, stone fruits, sweet corn, succulent peas, spinach and lettuce which were submitted under FIFRA Section 6(a)(2) because new tests showed diazinon residue to be in excess of the established tolerances. To address this issue, Ciba-Geigy amended label directions for use on these crops to include longer PHI's and/or lower use rates for some crops.

The EPA plans to use the label language accepted for Ciba-Geigy's diazinon products as the standard for the industry at this time. Within the next few weeks, the EPA plans to issue a letter to all diazinon registrants with copies of approved Ciba-Geigy labeling noting the label changes which have been accepted. End-use registrants will be required to resubmit their product labeling to reflect the acceptable label language. When the Agency completes review of the remaining residue chemistry, toxicology, environmental fate and ecological effects data and reassesses existing tolerances, other label changes may be necessary. Copies of the most recently accepted labels are enclosed for your information.

We realize that the diazinon labeling situation is unusual, since certain label changes are being made prior to the Agency's review of all reregistration data. However, we believe that the acceptance of the enclosed labeling will protect human health and environmental safety since it is more restrictive than previously accepted labeling. Furthermore, the standardization of labeling relative to use rates, crops and pests is reasonable and should facilitate end users' understanding of label directions. For these reasons, the Agency is accepting the enclosed labeling as the standard at this time.

No pesticide product containing diazinon may be released for shipment by the registrant after August 31, 1993, and no pesticide product containing diazinon may be distributed or sold after August 31, 1994, unless the product bears an amended label which matches the approved Ciba-Geigy labels.

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We hope that our comments have clarified the labeling status of diazinon products. If you have and questions or comments on diazinon reregistration, please contact Robert Richards at (703) 308-8057. For questions regarding diazinon labeling, please contact Dana Pilitt at (703) 305-7071.

Sincerely,

Lois A. Rossi
Lois A. Rossi, Chief
Reregistration Branch
Special Review and
Reregistration Branch

enclosures

cc: George LaRocca RD/PM
Dana Pilitt RD